

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In Re: Matter of)
)
Amendment of Section 73.202(b),) MM Docket No. 98-____
Table of Allotments,) RM-____
FM Broadcast Stations.)
)
(Aberdeen, Elma and Montesano, WA))

To: The Chief, Allocations Branch

PETITION FOR RULEMAKING

KAYO Broadcasting and Marrow, Inc., pursuant to Section 1.401(a) of the Commission's rules, hereby respectfully request that Section 73.202(b) of the Commission's rules (the FM Table of Allotments) be amended as follows:

<u>Community</u>	<u>Existing</u>	<u>Proposed</u>
Aberdeen	257C1, 284C2	284C2
Elma	271C3	257C1
Montesano	----	271C2

Concurrent with this relief, KAYO Broadcasting further requests that the license of station KAYO(FM) be modified to specify Elma, Washington as its community of license, and Marrow, Inc., requests that the permit of KAPV(FM) be modified to specify operation on Channel 271C2 in lieu of Channel 271C3 and that its community of license be modified from Elma to Montesano, Washington.

In support whereof, the following is respectfully shown:

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1. Submitted herewith on behalf of the joint petitioners is an engineering statement of Hatfield & Dawson, demonstrating that the relief requested herein will meet all applicable FCC requirements with respect to city coverage and channel spacing. The engineering statement further demonstrates that the reallocations proposed herein would result in a preferential arrangement of allotments pursuant to the Commission's change of community procedures. Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989), recon. granted in part, 5 FCC Rcd 7094 (1990).

2. The proposed change for KAPV(FM) would provide Montesano with its first local service. Montesano is an incorporated community with a 1990 census population of 3,247. Montesano is the county seat of Grays Harbor County (1990 population: 64,175). Montesano has its own post office, zip code and banks and is listed in the 1990 census. The nearest urbanized area is Tacoma, Washington, the closest portion of which (the Olympia area) is approximately 45 miles distant. (Tacoma itself is approximately 60 miles distant.) Accordingly, it is clear that Montesano is an independent community deserving of its first local transmission service.

3. With respect to the technical aspect of the KAPV proposal, it is respectfully noted that the upgrade from a Class C3 to a Class C2 channel would result in a service increase of 2,576 square kilometers and 9,601 persons. The Class C2 service contour from the allotment reference site would produce a 60 dBu contour which encompasses nearly the entire 60 dBu service contour of the present KAPV construction permit. The very slight loss of service will not result in the creation of any white, gray or underserved areas. On

the other hand, the proposed reallocation and upgrade would extend 60 dBu service to an existing underserved area (that is, an area presently served by fewer than five aural services) of 698 square kilometers and 2,145 persons.

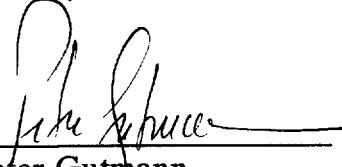
4. In order to eliminate a loss of local transmission service which otherwise would result from the reallocation of KAPV from Elma to Montesano, KAYO Broadcasting proposes to change the allotment of KAYO(FM), Channel 275C1, from Aberdeen to Elma. Thus, the community of Elma will not only receive a replacement service, but a superior one, operating with Class C1, rather than Class C3, facilities. As no change is proposed in the transmitter site of KAYO(FM), there will be no gain or loss in reception service. The only "loss" will be the removal of Channel 257C1 from Aberdeen. However, Aberdeen will continue to be served by station KDUX(FM), Channel 284C2, as well as two full-time AM stations -- KXRO (1320 KHz) and KBKW (1450 KHz). As Aberdeen had a 1990 census population of only 16,565, the three full-time commercial stations which remain should be more than sufficient to serve its needs.

5. In sum, the reallocations proposed herein will result in a first local service for Montesano; an upgrade of Elma's only station from Class C3 to Class C1 facilities; an overall extension of service to 9,601 persons; and an extension of service to an existing underserved area of 2,145 persons. These public interest benefits are more than sufficient to outweigh the removal of a fourth local commercial service from the community of Aberdeen. Accordingly, we respectfully submit that the allotments proposed herein would serve the public interest and should be implemented.

6. KAYO Broadcasting and Marrow, Inc. state herewith their present intention to promptly apply for and construct the requested facilities, if allotted.

Respectfully submitted,

**KAYO BROADCASTING
MARROW, INC.**

By: 
Peter Gutmann
Their Attorney

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December 1, 1998

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ENGINEERING STATEMENT

PETITION FOR RULEMAKING TO
AMEND SECTION 73.202 OF THE RULES
AND REGULATIONS FOR THE FEDERAL
COMMUNICATIONS COMMISSION

TO ASSIGN FM CHANNEL 257C1
FOR USE AT ELMA, WA

TO ASSIGN FM CHANNEL 271C2
FOR USE AT MONTESANO, WA

KAYO BROADCASTING & MARROW, INC.

AUGUST 1998

ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of KAYO Broadcasting, licensee of station KAYO(FM) channel 257C1 at Aberdeen, Washington; and Marrow, Inc., permittee of KAPV(FM) channel 271C3 at Elma, Washington, in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules. KAYO Broadcasting and Marrow, Inc. propose:

- A) The reallocation of channel 257C1 from Aberdeen to Elma, Washington, and the modification of station KAYO's license to specify Elma as its community of license.

- B) The reallocation and upgrade of channel 271C3 at Elma to channel 271C2 at Montesano, Washington, and the modification of station KAPV's construction permit to specify Montesano as its community of license.

Channel 257C1 at Elma, Washington

As outlined in the attached channel study, channel 257C1 can be assigned for use at Elma in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments. For this study the coordinates of the KAPV(FM) construction permit BMPH-970910IB have been used: NL 46° 57' 31" x WL 123° 35' 18". This site is 15 kilometers from the

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City of Elma, the reference coordinates of which are NL 47° 00' 13" x WL 123° 24' 27". The nominal distance to the 70 dBu F(50,50) contour for a Class C1 station is 50 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Elma.

The reference site for channel 257C1 at Elma meets the spacing requirements of §73.207 to all domestic co-channel and adjacent-channel allotments and authorizations. Under the terms of the Working Arrangement for the Allotment and Assignment of FM Broadcasting Channels Under the Agreement Between the Government of Canada and the Government of the United States of America Relating to the FM Broadcasting Service, as amended in 1997 ("Working Arrangement"), the reference site is nominally short-spaced to Canadian station CFOX(FM) 257C Vancouver, BC and to a Canadian allotment on channel 258A at Metchosin/Sooke, BC. (The apparent short-spacing to a Canadian allotment on channel 258A at Sooke, BC is moot, as that channel has been reallocated to Metchosin/Sooke.)

CFOX(FM) 257C: Under the terms of the Working Arrangement, the required co-channel spacing to CFOX is 302 kilometers, whereas the proposed reference site is 271 kilometers from CFOX. The attached allocation study map demonstrates that, assuming channel 257C1 operation at the reference site with maximum Class C1 parameters of 100 kW ERP at 299 meters HAAT, a power reduction of 6.2 dB along the 9.8 degree radial in the direction of CFOX will prevent overlap of the reference facility's 34 dBu F(50,10) interfering contour with the CFOX 58 dBu F(50,50) protected contour over Canadian land areas. Per the terms of Section 5.2.2.1 of the Working Arrangement, the distance to the CFOX 58 dBu F(50,50) protected contour has been based on maximum allowable parameters, out to a maximum of 97 kilometers.

Hatfield & Dawson Consulting Engineers

Metchosin/Sooke 258A: Under the terms of the Working Arrangement, the required first-adjacent-channel spacing to this allotment is 168 kilometers, whereas the proposed reference site is 156 kilometers from the allotment. The attached allocation study map demonstrates that, assuming channel 257C1 operation at the reference site with maximum Class C1 parameters of 100 kW ERP at 299 meters HAAT, no power reduction would be required to prevent overlap of the reference facility's 48 dBu F(50,10) interfering contour with the Metchosin/Sooke 54 dBu F(50,50) protected contour over Canadian land areas. Per the terms of Section 5.2.2.1 of the Working Arrangement, the distance to the Metchosin/Sooke 54 dBu F(50,50) protected contour has been based on maximum allowable parameters, out to a maximum of 38 kilometers.

The proposed reference site meets the domestic spacing requirements of 270 kilometers and 133 kilometers to CFOX and the Metchosin/Sooke allotment, respectively. Therefore, the proposed allotment reference site, with a power restriction in the direction of CFOX, is believed to comply with all domestic and international allotment requirements.

KAYO Broadcasting does not propose by this Petition for Rulemaking any change of transmitter site for KAYO. KAYO can continue to operate on channel 257C1 at Elma from its present transmitter site on Minot Peak, FCC File No. BLH-950626KE. The attached map exhibit demonstrates that the licensed KAYO facility provides 70 dBu service to all of Elma.

The only aural service presently assigned for use at Elma is KAPV channel 271C3, proposed herein for reallocation to Montesano as channel 271C2. Under the proposed reallocation plan, Elma would not lose first local service.

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Aberdeen is presently served by two local commercial FM stations (KAYO 257C1 and KDUX 284C2) and two local commercial AM stations (KXRO 1320 kHz and KBKW 1450 kHz). Therefore, the reallocation of channel 257C1 would not deprive Aberdeen of first local service. Furthermore, since KAYO can continue to operate on channel 257C1 at Elma from its present transmitter site on Minot Peak, grant of this petition will not result in a loss of service to Aberdeen.

Channel 271C2 at Montesano, Washington

As outlined in the attached channel study, channel 271C2 can be assigned for use at Montesano in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments. For this study the coordinates of an unnamed hilltop have been used: NL 47° 03' 44" x WL 123° 44' 44". This site is 14 kilometers from the City of Montesano, the reference coordinates of which are NL 46° 58' 53" x WL 123° 36' 05". The nominal distance to the 70 dBu F(50,50) contour for a Class C2 station is 32 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Montesano. This site is suitable for tower construction.

The KAPV construction permit facility provides 60 dBu service to 4110 km² (land area only) and 70,526 persons (1990 Census). Operation with maximum Class C2 facilities of 50 kW ERP and 150 meters HAAT at the allotment reference site would provide 60 dBu service to 6686 km² (land area only) and 80,127 persons (1990 Census), an increase of 2576 km² and 9,601 persons.

There are no AM or FM stations presently assigned for use at Montesano. The proposed reallocation and upgrade of this channel would provide first local service to Montesano, which is the county seat of Grays Harbor County.

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Canadian Notification

Since Elma and Montesano are located within 320 kilometers of the US-Canadian border, concurrence of the Canadian government will be required. Notification of this proposal to Canada is thereby requested.

White, Gray, and Underserved Areas

Since no site change for KAYO is proposed or necessary to accommodate the proposed allotment plan, the reallocation of channel 257C1 from Aberdeen to Elma would not result in the creation of any "white", "gray", or underserved areas.

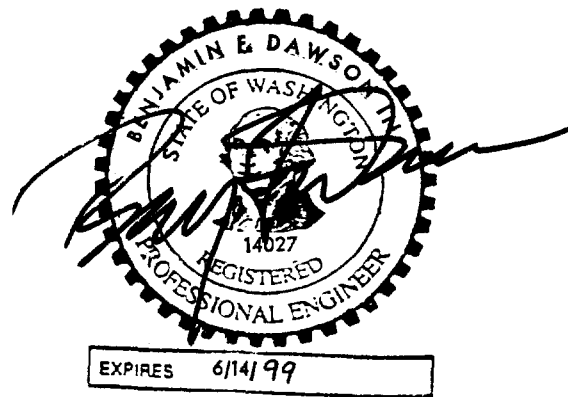
As shown on the attached map exhibit, KAPV operation with maximum Class C2 facilities of 50 kW ERP and 150 meters HAAT at the allotment reference site would produce a 60 dBu service contour which encompasses nearly 100% of the 60 dBu service contour of the present KAPV construction permit operation (FCC File No. BMPH-970910IB). An engineering analysis confirms that the reallocation and upgrade of channel 271C3 at Elma to channel 271C2 at Montesano will not result in the creation of any "white", "gray", or underserved areas. The proposed reallocation and upgrade will, in fact, provide 60 dBu service to an existing underserved area (*i.e.*, an area which is presently served by fewer than five aural services) of 698 square kilometers and 2,145 persons (1990 Census). The extent of this area is depicted on the attached map exhibit.

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CERTIFICATION

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments to reallocate channel 257C1 from Aberdeen to Elma, Washington; to reallocate channel 271C3 at Elma to channel 271C2 at Montesano, Washington; and to modify the KAYO license and KAPV construction permit to specify their revised communities of allotment, has been prepared on behalf of KAYO Broadcasting and Marrow, Inc. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 5th day of August, 1998.



Benj. F. Dawson III, P.E.

Hatfield & Dawson Consulting Engineers

Seattle, WA

FM SEPARATION STUDY

Job Title :257C1 at KAPV Site

Separation Buffer 100 km

FCC DB Date : 06/23/98

Channel 257C1 (99.3 MHz)

Coordinates : 46-57-31 123-35-18

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
KPLUFM LIC	Tacoma WA	BLED890925KA	203C 88.5	58. DA 714.0	47-30-14 121-58-29	63.0	136.42 95.42	41 CLEAR
KUPLFM CP	Portland OR	BPH970708ID	254C1 98.7	37. 440.0	45-30-58 122-43-59	157.4	173.39 91.39	82 CLEAR
From Channel 253C per D96-212								
KWJZ LIC	Seattle WA	BLH970317KB	255C 98.9	58.0 DA 714.0	47-30-14 121-58-29	63.0	136.42 31.42	105 CLEAR
SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION.								
K256AC LIC	The Dalles OR	BLFT950626TB	256D 99.1	.010 798.0	45-42-43 121-07-00	125.3	235.42 .00	0 TRANS
Translator For KBVM, Portland, OR								
KAYOFM LIC	Aberdeen WA	BLH950626KE	257C1 99.3	39. DA 432.0	46-54-05 123-25-07	116.2 SS	14.42 -230.58	245 SHORT
Accepted by Canada as a specially negotiated short-spaced station by letter dated 901220								
KAYO-1 CP	Olympia, etc. WA	BPFTB951115TB	257D 99.3	1.0 144.0	47-00-57 122-54-58	82.6	51.54 .00	0 BOOST
NEW APP	Naches WA	BPH970814MG	257A 99.3	6.0 100.0	46-46-08 120-52-11	94.8 SS	208.37 8.37	200 CLOSE
NEW APP	Naches WA	BPH970813MC	257A 99.3	.13 635.0	46-48-26 120-49-20	93.6 SS	211.52 11.52	200 CLOSE
ALC	Naches WA	Docket97-2	257A 99.3	.0 120-47-55	46-49-09 120-47-55	93.2	213.19 13.19	200 CLOSE
Proposed as Class B1 to Canada 970108-Limited to 6kw ERP and 100m HAAT or the equivalent-Accepted by Canada 970429								
Site Restriction 12.4km Northwest-Effective 7-14-97 per D97-2								
CFOXFM	Vancouver BC		257C 99.3	72. DA 686.0	49-21-29 122-57-09	9.8	270.96 -31.04	302 SHORT
NOTE: DOMESTIC SPACING OF 270 KILOMETERS IS MET TO THIS ALLOTMENT								
	Sooke BC		258A 99.5	.0 123-41-10	48-21-28 123-41-10	357.3	155.75 -12.25	168 SHORT
NOTE: SOOKE 258A HAS BEEN REALLOTTED TO METCHOSIN/SOOKE								

Seattle, WA

FM SEPARATION STUDY

Job Title :257C1 at KAPV Site

Separation Buffer 100 km

FCC DB Date : 06/23/98

Channel 257C1 (99.3 MHz)

Coordinates : 46-57-31 123-35-18

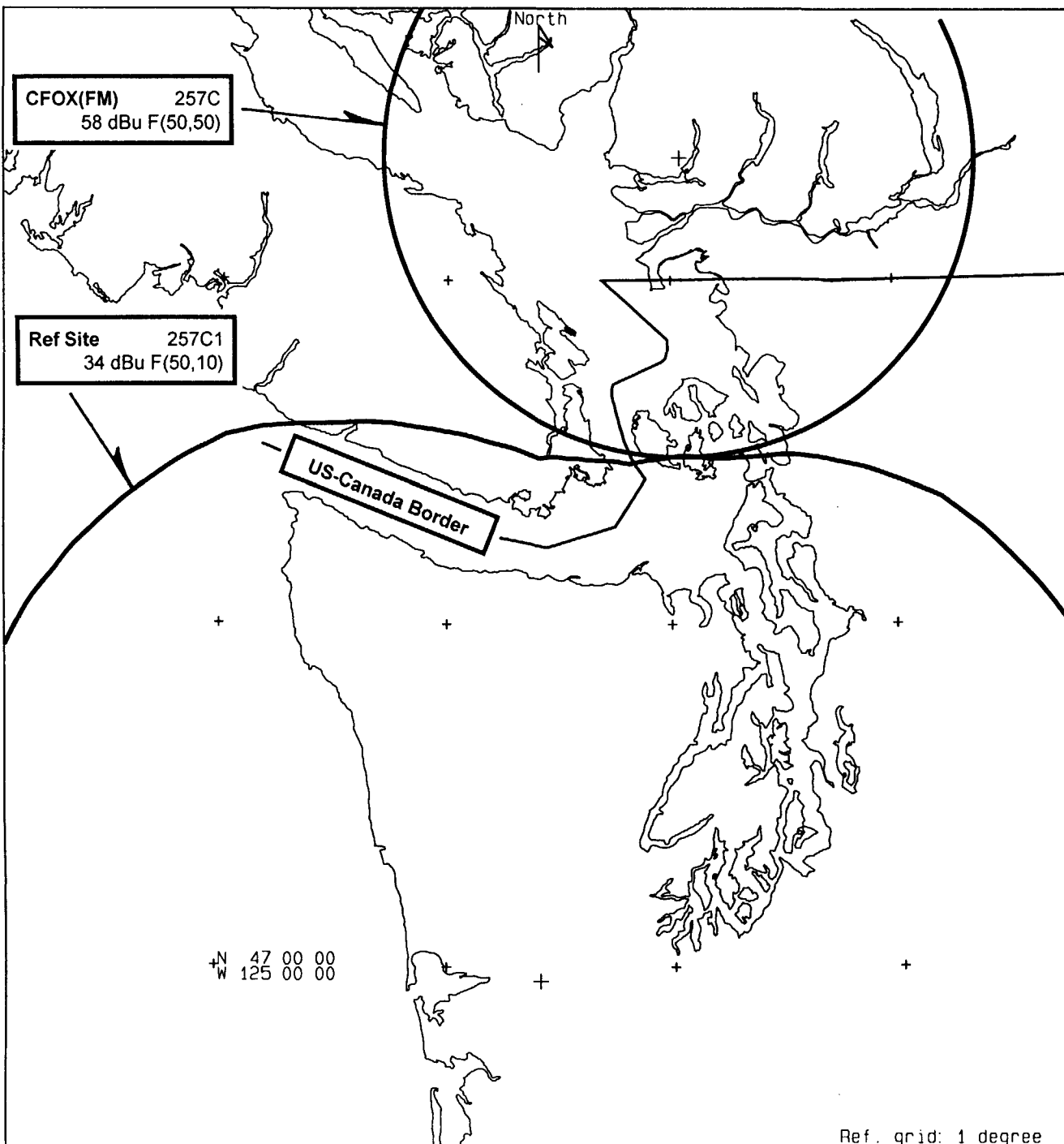
Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
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	Sooke		258A		48-21-28	357.3	155.75	168
	BC		99.5	.0	123-41-10		-12.25	SHORT
Proposed by Canada 970825-Accepted by Commission 970919								
NOTE: SOOKE 258A HAS BEEN REALLOTTED TO METCHOSIN/SOOKE								

	Metchosin etc.		258A		48-24-09	.4	160.55	168
	BC		99.5	.0	123-34-20		-7.45	SHORT
Proposed by Canada 970825-Specially negotiated, short-spaced allotment-								
Accepted by Commission 970919								
NOTE: DOMESTIC SPACING OF 133 KILOMETERS IS MET TO THIS ALLOTMENT								

KWJJFM	Portland		258C1	52.	45-29-20	156.9	177.34	177
LIC	OR	BLH911106KG	99.5	386.0	122-41-40		.34	CLOSE
K259AA	Seattle-Alki Beach		259D	.019	47-34-45	51.8	112.80	0
LIC	WA	BLFT860313TP	99.7	21.0	122-24-33		.00	TRANS
TRANSLATOR FOR KISW, SEATTLE, WA								
KISW	Seattle		260C	100.	47-32-41	59.2	129.65	105
LIC	WA	BLH850916KK	99.9	350.0	122-06-28		24.65	CLEAR
SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION								

** End of separation study for channel 257C1 **



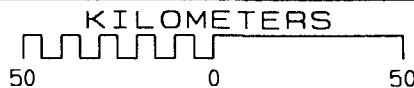
HATFIELD & DAWSON

SEATTLE, WA

This map exhibit depicts the 34 dBu F(50,10) contour from a hypothetical operation at the proposed channel 257C1 reference site with maximum Class C1 facilities of 100 kW at 299 meters HAAT, and with a power reduction of 6.2 dB in the direction of CFOX(FM).

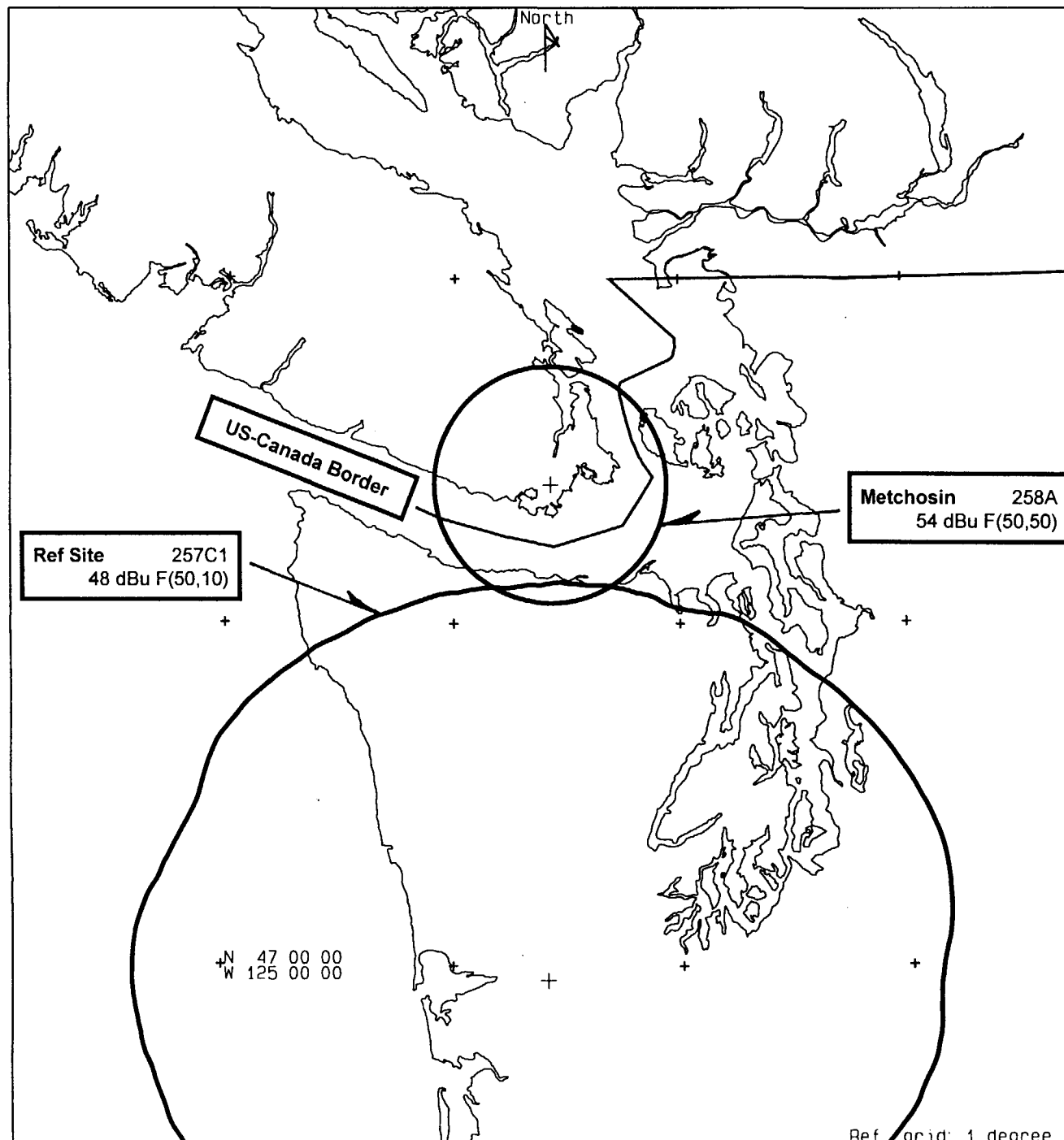
Per the terms of the Working Arrangement, the distance to the CFOX 58 dBu F(50,50) contour has been based on maximum allowable parameters, out to a maximum distance of 97 kilometers.

The resulting 257C1 34 dBu F(50,10) contour does not overlap the CFOX 58 dBu F(50,50) contour over Canadian land areas.



Allocation Study

Hatfield and Dawson



HATFIELD & DAWSON

SEATTLE, WA

This map exhibit depicts the 48 dBu F(50,10) contour from a hypothetical operation at the proposed channel 257C1 reference site with maximum Class C1 facilities of 100 kW at 299 meters HAAT, and with no power reduction.

Per the terms of the Working Arrangement, the distance to the Metchosin/Sooke 258A 54 dBu F(50,50) contour has been based on maximum allowable parameters, out to a maximum distance of 38 kilometers.

The resulting 257C1 48 dBu F(50,10) contour does not overlap the Metchosin/Sooke 54 dBu F(50,50) contour over Canadian land areas.



Allocation Study

Hatfield and Dawson

Elma

July 1998

KAYO(FM) 257C1
Lic 70 dBu F(50,50)

North

City of Elma

N 46 45 00
W 123 45 00

HATFIELD & DAWSON SEATTLE, WA

This map exhibit demonstrates that the channel 257C1 facility authorized in KAYO's license BLH-950626KE provides 70 dBu service to all of Elma.

KILOMETERS



257C1 at Elma

Hatfield and Dawson

Elma

July 1998

Ref. grid: 15'

Seattle, WA

FM SEPARATION STUDY

Job Title :KAPV 271C2 Reference Site

Separation Buffer 100 km

FCC DB Date : 07/28/98

Channel 271C2 (102.1 MHz)

Coordinates : 47-03-44 123-44-44

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
KCED LIC	Centralia WA	BLED900515KA	217A 91.3	1.00 -22.0	46-42-56 122-57-48	122.7	71.00 56.00	15 CLEAR
Specially negotiated, short-spaced assignment.								
NEW-T APP	Delphi WA	BPFT980715TA	218D 91.5	.01 DA 769.0	46-58-22 123-08-17	102.0	47.26 .00	0 TRANS
KPLZ LIC	Seattle WA	BLH800925AH	268C 101.5	100. 366.0	47-32-42 122-06-29	65.9	134.98 29.98	105 CLEAR
SPECIAL NEGOTIATED SHORT SPACED ALLOCATION.								
CFUVFM BC	Victoria BC		270A 101.9	2.29 58.0	48-27-52 123-18-35	11.6	159.30 22.30	137 CLEAR
KINKFM LIC	Portland OR	BLH860923KD	270C 101.9	100. 510.0	45-31-21 122-44-46	155.5	187.69 -.31	188 SHORT
KAPV CPM	Elma WA	BMPH970910IB	271C3 102.1	25.0 98.0	46-57-31 123-35-18	134.0 SS	16.61 -160.39	177 SHORT
KPQFM LIC	Wenatchee WA	BLH3856	271C 102.1	35. 809.0	47-16-28 120-25-30	83.4	252.86 3.86	249 CLOSE
CBUF-1 BC	Chilliwack BC		271A 102.1	.081 199.0	49-06-36 121-50-47	31.1	268.08 58.08	210 CLEAR
KULU CPM	Seaside OR	BMPH971125IC	272C3 102.3	25.0 100.0	45-57-08 123-56-14	186.8 SS	124.27 7.27	117 CLOSE
Proposed as Class B1 to Canada 980226-Accepted by Canada 980402								
K272DS CP	Cannon Beach OR	BPFT960502TE	272D 102.3	.032 69.0	45-52-48 123-57-15	187.0	132.40 .00	0 TRANS
Translator for KCMS, Edmonds, WA								
	Nanaimo BC		272A 102.3	.0	49-10-00 123-56-00	356.7	234.42 97.42	137 CLEAR
KZOKFM LIC	Seattle WA	BLH6556	273C 102.5	100. 357.0	47-32-35 122-06-25	66.0	134.97 29.97	105 CLEAR
KZOKFM CP	Seattle WA	BPH950523ID	273C 102.5	58.0 DA 714.0	47-30-14 121-58-29	69.2	142.70 37.70	105 CLEAR

Hatfield & Dawson, Inc.

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Seattle, WA

FM SEPARATION STUDY

Job Title :KAPV 271C2 Reference Site

Separation Buffer 100 km

FCC DB Date : 07/28/98

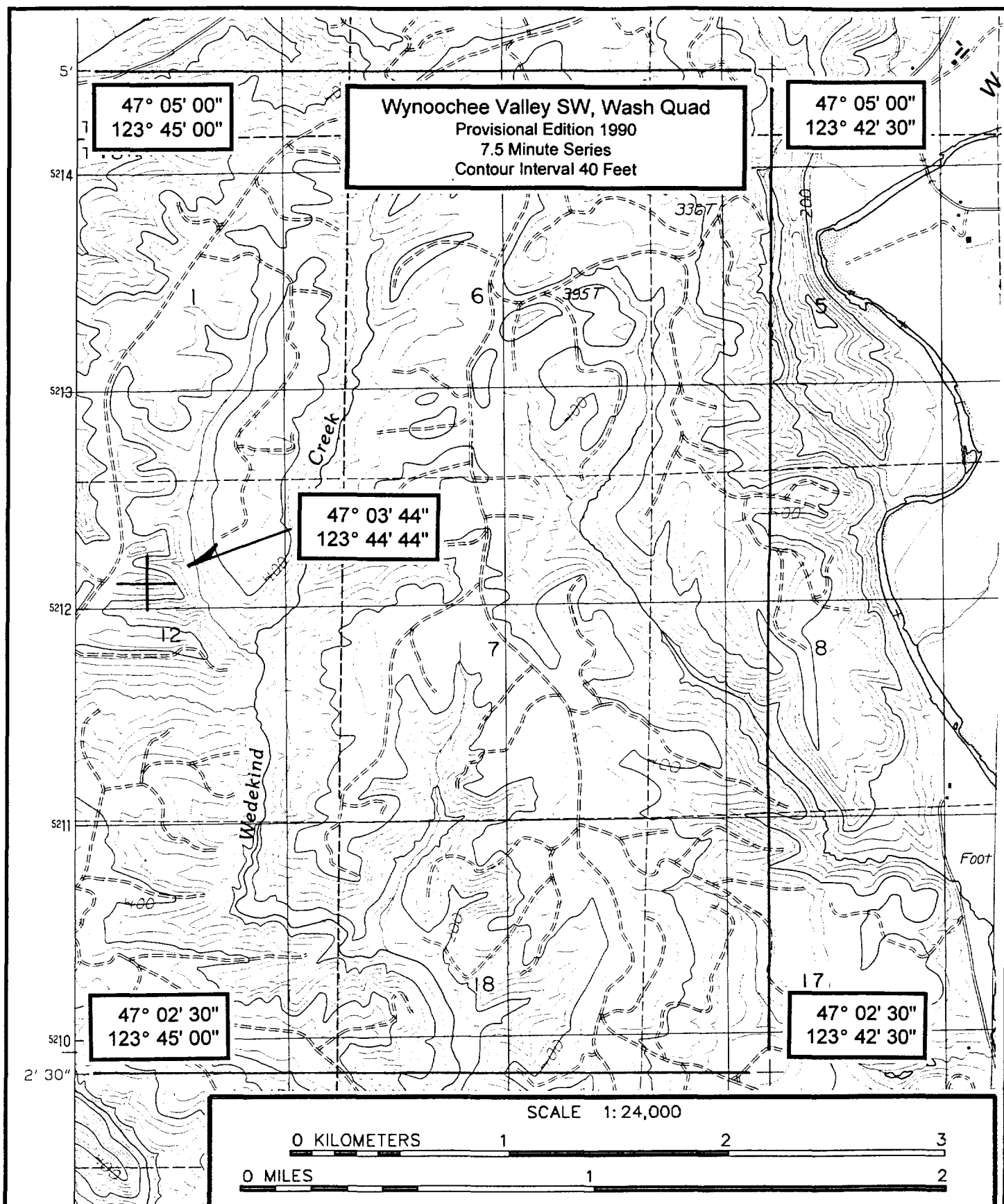
Channel 271C2 (102.1 MHz)

Coordinates : 47-03-44 123-44-44

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
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	Victoria		274D		48-27-39	10.8	158.43	0
	BC		102.7	.0	123-20-32		.00	CLS=D

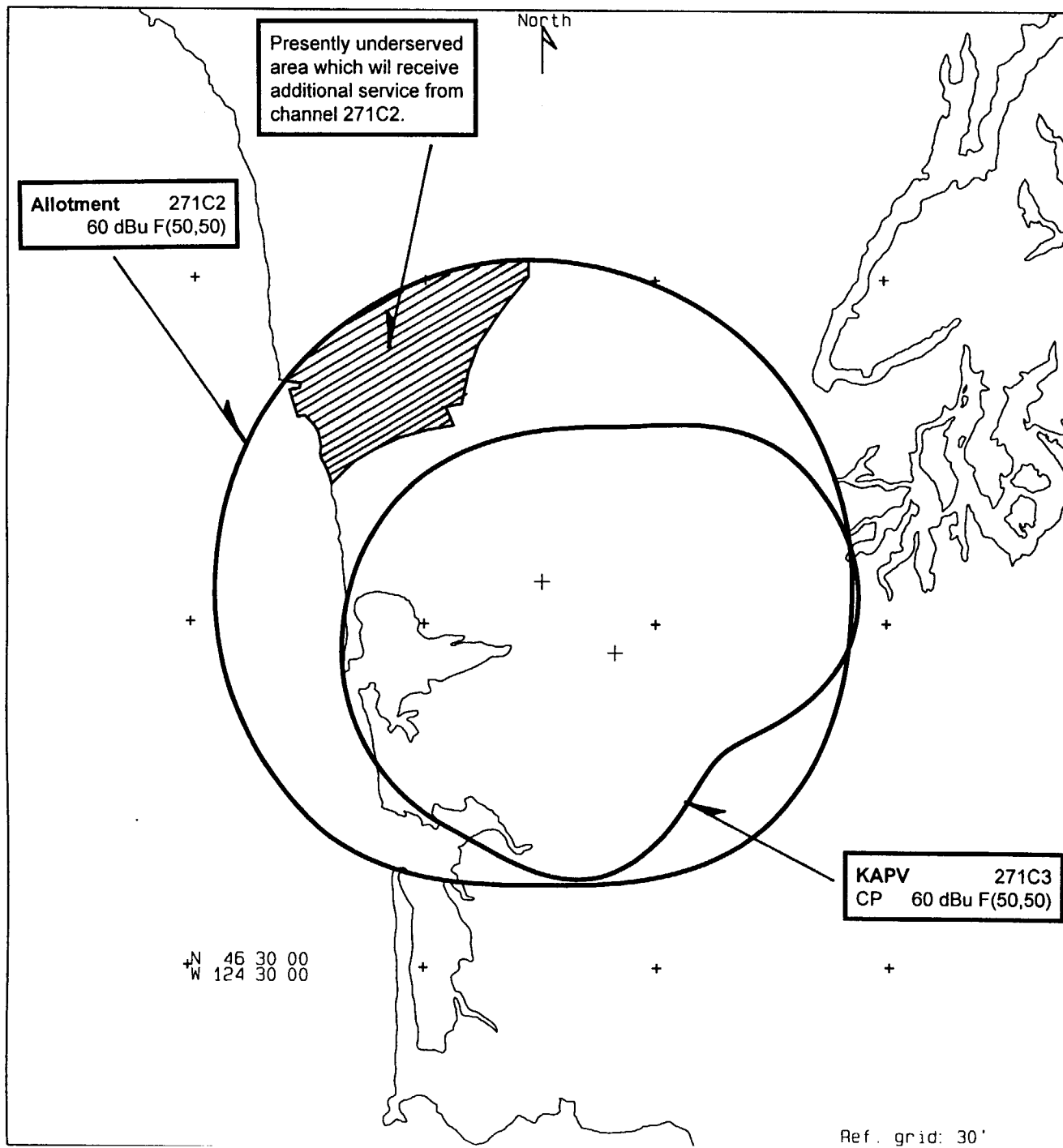
** End of separation study for channel 271C2 **



**HATFIELD & DAWSON
CONSULTING ENGINEERS**

**MAP SHOWING LOCATION OF ALLOTMENT SITE
FOR CHANNEL 271C2 AT MONTESANO
MONTESANO, WA**

8/98



HATFIELD & DAWSON

SEATTLE, WA

This map exhibit demonstrates that KAPV operation with maximum Class C2 facilities of 50 kW ERP and 150 meters HAAT at the allotment reference site would produce a 60 dBu service contour which encompasses nearly 100% of the 60 dBu service contour of the present KAPV construction permit operation (FCC File No. BMPH-970910IB).

This exhibit also depicts the extent of the presently underserved area which will receive additional service from the proposed allotment of channel 271C2 at Montesano.



Montesano 271C2

Hatfield and Dawson

Montesano

August 1998